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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

## PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

## Debtors.

Affects Both Debtors

Affects PG&E Corporation

Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)  
Chapter 11  
(Jointly Administered)

**DECLARATION OF ANDREW BEHLMANN  
IN SUPPORT OF *EX PARTE* MOTION OF  
SECURITIES LEAD PLAINTIFF PURSUANT  
TO B.L.R. 9006-1 REQUESTING ORDER  
SHORTENING TIME FOR HEARING ON  
SECURITIES LEAD PLAINTIFF'S MOTION  
TO STRIKE DECLARATION OF  
CHRISTINA PULLO IN SUPPORT OF THE  
DEBTORS' SUPPLEMENTAL BRIEF IN  
RESPONSE TO THE COURT'S TENTATIVE  
RULING REGARDING MOTION TO APPLY  
RULE 7023 AND ORDER SETTING  
DEADLINE [ECF NO. 5789]**

**Related Document: Dkt. 5814**

[No hearing requested]

I, Andrew D. Behlmann, Esq., hereby declare as follows, pursuant to 28 U.S.C. § 1746:

1. I am a Partner of the law firm of Lowenstein Sandler LLP, bankruptcy counsel in these chapter 11 cases of the above-captioned debtors in possession (the “**Debtors**”) to Public

1 Employees Retirement Association of New Mexico, the court-appointed lead plaintiff (“**Lead**  
2 **Plaintiff**”) in the securities class action styled as *In re PG&E Corporation Securities Litigation*,  
3 Case No. 3:18-cv-03509-RS, the (“**Securities Litigation**”), pending in the United States District  
4 Court for the Northern District of California.

5       2. I submit this Declaration in support of the *Ex Parte Motion of Securities Lead*  
6 *Plaintiff Pursuant to B.L.R. 9006-1 Requesting Order Shortening Time for Hearing on Securities*  
7 *Lead Plaintiff’s Motion to Strike Declaration of Christina Pullo in Support of the Debtors’*  
8 *Supplemental Brief in Response to the Court’s Tentative Ruling Regarding Motion to Apply Rule*  
9 *7023 and Order Setting Deadline [ECF No. 5789]* (the “**Motion to Shorten Time**”), filed  
10 contemporaneously herewith.<sup>1</sup> Except as otherwise indicated herein, the facts set forth in this  
11 Declaration are based upon my personal knowledge, information provided to me by Lead Plaintiff,  
12 or based upon my knowledge and belief. I am authorized to submit this Declaration on behalf of  
13 Lead Plaintiff.

14       3. In the Motion to Shorten Time, Lead Plaintiff requests that the Motion to Strike be  
15 heard on an expedited basis at 1:30 p.m. (prevailing Pacific Time) on February 20, 2020, and that  
16 any responses or objections to the Motion to Strike be in writing and filed with the Court and  
17 served by 4:00 p.m. (prevailing Pacific Time) on February 19, 2020.

18       4. On February 17, 2020, a continued hearing was scheduled on the Court’s calendar  
19 regarding the related Rule 7023 Motion for February 20, 2020 (the “**Continued Rule 7023**  
20 **Hearing**”).

21       5. Prompt approval of the Motion to Strike is necessary to clarify the scope of the  
22 factual record properly before the Court in advance of the Continued Rule 7023 Hearing and before  
23 the Court renders a decision on the Rule 7023 Motion.

24       6. No previous request for the relief sought in the Motion to Shorten Time has been  
25 made by Lead Plaintiff to this or any other court.

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26       1 Capitalized terms used but not defined herein have the meanings given to them in the *Securities*  
27 *Lead Plaintiff’s Motion to Strike Declaration of Christina Pullo in Support of the Debtors’*  
28 *Supplemental Brief in Response to the Court’s Tentative Ruling Regarding Motion to Apply*  
Rule 7023 and Order Setting Deadline [ECF No. 5789] (the “**Motion to Strike**”) or the Motion  
to Shorten Time, as applicable.

1           7. The requested time modification will serve to maintain the current schedule for the  
2 case.

3       8. At approximately 12:30 p.m. PST on the date hereof, I reached out to Debtors'  
4 counsel, via email, requesting that the Debtors stipulate to the proposed shortened time. Given the  
5 necessity that the Motion to Strike be resolved prior to or in conjunction with the Continued Rule  
6 7023 Hearing, it was not feasible to further await a response from the Debtors' counsel or to seek  
7 consent other from parties prior to the filing of the Motion to Shorten Time. However, cause exists  
8 to hear the Motion to Strike on shortened time, as described therein, in the Motion to Shorten Time,  
9 and in the related filings.

I declare under penalty of perjury that the foregoing statements made by me are true and correct to the best of my knowledge, information, and belief, and I understand that I am subject to punishment if any of the foregoing statements made by me are willfully false.

Dated: February 18, 2020

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*/s/ Andrew D. Behlmann*  
Andrew D. Behlmann, Esq.